Remarks

The present response is to the Office Action mailed in the above-referenced case on February 24, 2005. Claims 16-27 are rejected under 35 U.S.C. 103(a) as being unpatentable over the newly presented reference of Draginich et al. (U.S. 6,560,329), hereinafter Draginich. Applicant has carefully studied the prior art presented by the Examiner, and the Examiner's rejections and statements of the instant Office Action. In response applicant herein provides argument that the prior art cited and applied by the Examiner in this case does not a obviate applicant's claims, and to establish that the claims in their present form clearly and unarguably distinguish applicant's invention over that of the prior art teachings. Applicant points out and argues the key limitations of applicant's independent claims, which the Examiner appears to misunderstand in his rejections and statements.

The Examiner has stated that, regarding independent claims 16 and 22, that Draginich teaches a system for routing a communication event in a call center having routing means provided by a CTI server, the event initiated by an originator at a computerized workstation outside the call center, comprising substantially all of the limitations of applicant's claims, including a software-enabled SIP mechanism operable on the workstation by the originator to prepare and send an SIP-protocol routing request. The Examiner adds that, while Draginich may not specifically disclose SIP-to-non-SIP conversions performed specifically within the routing controller 20, such conversion is implicitly performed by the routing controller or call server.

Applicant respectfully traverses the Examiner's interpretation of Draginich as teaching or suggesting all of the capabilities and limitations of applicant's invention and claims in their present form, and further that SIP-to-non-SIP conversions are implicitly performed by the routing controller or call server.

Applicant now directs the Examiner's attention to Draginich, with reference to figure 5, wherein a specific embodiment of the automatic call distribution system of

figure 1 is illustrated, employing a Centrex system, whereby telephony calls are physically routed to agents either by using a standard and well-known PBX switch 42, or the Centrex system 101. However, applicant respectfully points out and argues that the teachings of Draginich deal only with telephony signals, and teaches nothing at all to do with Session Initiation Protocol (SIP) messaging, or conversion of signals from SIP-to-non-SIP, as is taught in applicant's invention, and that Draginich would clearly have no motivation to do so.

Applicant has carefully reviewed the portions in Draginich cited and applied by the Examiner in support of his statement, as well as the remainder of the reference, and it is clear to applicant that the teachings describe that many different types of telephony protocols are used in event routing, however, there is no teaching or suggestion of SIP messaging, or conversion of SIP protocol events to non-SIP events, and such messaging or conversion is not implicitly performed by the routing controller or call server because Draginich deals only with telephony events such as IPNT or COST, for instance. Further, as is clearly illustrated in the routing systems of figures 1 and 5, the connections to the destination agents for routing events are telephony trunk lines which deal only with COST or IPNT telephony events and standard telephony interfaces.

Applicant's invention, on the other hand, teaches in the multimedia communications center, routing the communication events through intelligence provided by a CTI server of the communications center, characterized in that the reformatting mechanism converts the SIP routing requests into the protocol understood by the CTI server. Referring to applicant's figure 4, the connections to the agent workstations (A, N) are not telephony trunk lines, such as in Draginich, and there is no requirement for telephony trunk lines. The advantageous distinction of applicant's invention is providing the capability of sending a telephony event along with a routing request in a different protocol, as well as the ability at the routing destination of the routing event to interpret the event as being of SIP protocol, and then translating the event data into the data form recognizable by the CTI server, such that the CTI server can then provide and return an intelligent routing determination for the event of the SIP request based on the routing

rules established for the entire call center. The advantages that the event itself and the SIP routing request can be completely separate and even delivered by entirely different means.

In applicant's invention, when a caller initiates an event, such as a telephone call, a SIP message is sent concurrently through the Internet, and the CTI server of applicant's invention has software compatible with SIP protocol and converts SIP routing requests to a language or protocol understandable by the routing server for determining routing for the agent. Applicant's invention has the goal of using telephony routing protocol intelligence uniformly to route any and all kinds of communication events, whether they be IPNT or COST telephone calls, e-mails, chat communications, or any other communication event typically handled by a communication center. This allows uniform application of routing rules which are built specifically for each and every type of telephony event, and intelligently routes all of these types of events. Further, applicant's teaching also allows the set up of communication call centers to operate without the need for installation of new additional equipment, etc., by using the intelligence software of the CTI server and SIP messaging and conversion.

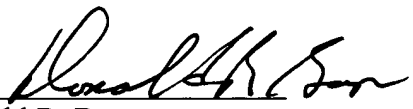
Further, applicant argues that, in shifting the location of the protocol conversion of Draginich simply from the call server 22 to the routing controller 20 Draginich would still fail to teach or suggest or have motivation for sending or initiating SIP routing requests along with the event initiation, or re-formatting the SIP routing request into a protocol understood by a CTI server, the CTI server determining and returning the routing for the communication event, because Draginich does not teach routing SIP requests in a communication center and has no motivation to do so.

Therefore, applicant strongly believes that the claims in their present form clearly and unarguably distinguish over the reference of Draginich, because applicant's invention has the obvious and advantageous distinction of providing the ability to send a telephony event along with a routing request using different protocols, as well as the ability at the routing destination of the routing event to interpret the event as being of SIP protocol, and then converting the event data into the data type recognizable by the CTI server, such that

the CTI server may then provide and return intelligent routing decisions for the event of the SIP request, based on the routing rules already conventionally established or the entire call center.

As all of the claims standing for examination have been demonstrated to be patentable over the art of record, applicant respectfully requests reconsideration, and that the present case be passed quickly to issue. If there are any time extensions needed beyond any extension specifically requested with this response, such extension of time is hereby requested. If there are any fees due beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,
Dan Kikinis

by 
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